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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

NANCY MCCARTER,  
Plaintiff,

vs.

KILOLO KIJAKAZI, Acting  
Commissioner of Social Security,  
Defendant.

Case No. 1:23-cv-01153-JLT-BAM  
STIPULATION AND ~~PROPOSED~~  
ORDER FOR EXTENSION OF  
TIME

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from October 30, 2023 to December 29, 2023, for Plaintiff to serve on defendant with PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT . All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's first request for an extension of time. Plaintiff respectfully states that the requested extension is necessary due several merit briefs being due

1 on the same week. For the weeks of October 23, 2023 and October 30, 2023,  
2 Counsel has seventeen merit briefs, a reply briefs, and a Plaintiff's Settlement  
3 Proposal due. Counsel requires additional time to brief the issues thoroughly for  
4 the Court's consideration. Defendant does not oppose the requested extension.  
5 Counsel apologizes to the Defendant and Court for any inconvenience this may  
6 cause.

7  
8 Respectfully submitted,

9 Dated: October 12, 2023

PENA & BROMBERG, ATTORNEYS AT LAW

11 By: /s/ Dolly M. Trompeter  
12 DOLLY M. TROMPETER  
13 Attorneys for Plaintiff

15 Dated: October 12, 2023

16 PHILLIP A. TALBERT  
17 United States Attorney  
18 PETER K. THOMPSON  
19 Acting Regional Chief Counsel, Region IX  
20 Social Security Administration

21 By: \*/s/ Franco L. Becia  
22 Franco L. Becia  
23 Special Assistant United States Attorney  
24 Attorneys for Defendant  
25 (\*As authorized by email on October 12, 2023)  
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**ORDER**

Pursuant to the parties' stipulation, and cause appearing, Plaintiff's deadline to file a motion for summary judgment is extended to December 29, 2023. All other deadlines in the Court's Scheduling Order are modified accordingly. The parties are advised that no further extensions of time will be granted absent a demonstrated showing of good cause.  
IT IS SO ORDERED.

Dated: October 16, 2023

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE